

# **TECHNICAL REVIEW AND EVALUATION FOR MINOR REVISION NO. 37062**

**PERMITTEE:** El Paso Natural Gas Co.

**ADDRESS:** PO Box 1087  
Colorado Springs, CO 80901-9906

**EQUIPMENT LOCATION:**

Hwy 95 (N), exit on I-40 / 5499 West Needle Mountain  
Road, Topock, Mohave County, AZ 86436

**APP RCVD. DATE:** 7/15/2005

**ORIGINAL PERMIT NO:** 27956

**PORTABLE:** No

**PERMIT CLASS:** I

**TITLE V SOURCE:** Yes

QUALIFICATION FOR MINOR PERMIT REVISION	YES	NO	N/A	RMK. NO.	RVWD BY
1. Has a complete minor permit revision application been filed? Application should include a description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs. A certification by a responsible official consistent with the standard permit application requirements, that the proposed revision meets the criteria for use of minor permit revision procedures and a request that such procedures be used. For Class I sources, the source's suggested draft permit should be included.	X			1	Vk2
2. Has the permittee paid the appropriate application fee?		X			Vk2
3. <u>The changes proposed at the source:</u>					
(a) do not violate any applicable requirements; AND	X				Vk2
(b) do not involve substantive changes to existing monitoring, reporting or recordkeeping requirements in the permit; AND	X				Vk2
(c) do not require or change a case-by-case determination of an emission limitation or other standard, or a source specific determination of ambient impacts, or a visibility or increment analysis; AND	X				Vk2
(d) do not seek to establish or change a permit condition to avoid a requirement which would otherwise apply. Examples of this are a federally enforceable emission cap used to avoid classification as a modification under any provisions of the Title I of the Act; and an alternative emissions limit approved pursuant to section 112(i)(5) of the CAA; AND	X				Vk2
(e) are not modifications under any provision of Title I of the Act or regulations promulgated in ARS 49-426.06; AND	X				Vk2

**TECHNICAL REVIEW AND EVALUATION**  
**FOR MINOR REVISION NO. 37062, CONTINUED**

QUALIFICATION FOR MINOR PERMIT REVISION	YES	NO	N/A	RMK. NO.	RVWD BY
3. The changes proposed at the source: (a) are not changes in fuels not represented in the permit application or provided for in the permit; <p style="text-align: center;">AND</p> (b) do not increase the source's potential to emit any regulated air pollutant by an amount greater than "significant"; <p style="text-align: center;">AND</p> (c) do not require to be processed as a significant permit revision;	X				Vk2
4. If it is a change to a Class I permit, were the Administrator and affected states informed within 5 working days of receipt of the application?	X			2	Vk2
5. For minor permit revisions to Class II permits, did the Director (a) issue the permit revision as proposed; <p style="text-align: center;">OR</p> (b) deny the permit revision application; <p style="text-align: center;">OR</p> (c) determine that the permit revision does not meet the minor permit revision criteria; <p style="text-align: center;">OR</p> (d) revise and issue the proposed revision <u>within 90 days</u> of receipt of the application?			X		Vk2
6. For minor permit revisions to Class I permits, did the Director provide the Administrator 45 days to review the revision? The Administrator can, however, notify the Director that the Administrator will not object to the issuance of permit revision before the end of their 45 day review period.	X				Vk2
7. For minor permit revisions to Class I permits, did the Director (a) issue the permit revision as proposed; <p style="text-align: center;">OR</p> (b) deny the permit revision application; <p style="text-align: center;">OR</p> (c) determine that the permit revision does not meet the minor permit revision criteria; <p style="text-align: center;">OR</p> (d) revise and issue the proposed revision <u>within 90 days</u> of receipt of the application?	X				Vk2

**TECHNICAL REVIEW AND EVALUATION**  
**FOR MINOR REVISION NO. 37062, CONTINUED**

REMARK NUMBER	REMARKS	RECVD BY
1.	<p>This Minor Revision permit is for inclusion of 2 emergency generators (135 HP and 10 HP) to the equipment list for existing Permit No. 37062 for Mojave Topock Compressor Station. The potential-to-emit from these generators for the worst case scenario of 8760 hours of operation will be:</p> <p>NO<sub>x</sub> : 18.14 tpy CO: 14.09 tpy VOC: 0.52 tpy</p> <p>These emission increases are below the significant emission rates identified in A.A.C.R18-2-101(105). The revision meets all the requirements as outlined in A.A.C.R18-2-319.A for minor permit revisions for Class I permit.</p>	Vk2
2.	<p>EPA has been notified of this minor revision application. The draft permit will be forwarded to EPA for the 45-day review.</p>	



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To Air Quality Control Permit No. 27956  
El Paso Natural Gas Company  
Mojave Topock Compressor Station**

**MINOR PERMIT REVISION DESCRIPTION**

The Mojave Topock Compressor Station is currently permitted by Title V Permit Number 27956 which was issued on April 21, 2004. The Title V permit authorized the operation of one (1) Solar Saturn Natural Gas Turbine (1040 hp), three (3) Cooper Bessemer Reciprocating engines (4080 hp each) and two (2) Caterpillar Generators (1500 hp each).

This Minor Permit Revision allows EPNG to operate two (2) Onan natural gas-fired emergency generators (135 hp and 10 hp respectively).

The increase in annual potential to emit for the facility, as a result of this revision, will be 18.14 tons/year for NO<sub>x</sub> and 14.09 tons/year for CO. These increases are below the significant level for these pollutants.

This minor permit revision for El Paso Natural Gas Co. results in the following changes to Operating Permit No.: 27956:

1. Amendments to the requirements set forth in Attachment "B"
2. Amendments to the equipment list in Attachment "C"



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**Amendments to the requirements set forth in Attachment "B" of Operating Permit No. 27956**

**Condition II.A and II.B.1 shall be changed to read as:**

**II. SOLAR SATURN TURBINE, COOPER BESSEMER RECIPROCATING COMPRESSOR ENGINES, CATERPILLAR GENERATORS AND ONAN EMERGENCY GENERATORS**

**A. Applicability**

This section applies to the Solar Saturn gas turbine engine, Cooper Bessemer reciprocating engines, Caterpillar generators and Onan Emergency Generators.

**B. Fuel Limitation**

1. The Permittee shall only combust pipeline quality natural gas as the fuel in the Solar Saturn turbine, Cooper Bessemer reciprocating engines, Caterpillar generators and Onan emergency generators. [A.A.C. R18-2-306.A.2]

**Condition II.C.1.a shall be changed to read as:**

**C. Particulate Matter and Opacity**

**1. Emission Limitations/Standards**

- a. The Permittee shall not cause, allow or permit to be emitted into the atmosphere, from the Solar Saturn turbine engine and Onan emergency generators, smoke for any period of time greater than ten consecutive seconds which exceeds 40 percent opacity, measured in accordance with the Arizona Testing Manual, Reference Method 9. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes.

[A.A.C. R18-2-719.E]

**Condition II.C.2.a and II.C.2.d shall be changed to read as:**

**2. Monitoring and Recordkeeping Requirements**

- a. A certified Environmental Protection Agency (EPA) Reference Method 9 observer shall conduct a quarterly survey of visible emissions emanating from the stacks of the Cooper Bessemer reciprocating engines, Caterpillar generators and Onan emergency generators. If any of the Cooper Bessemer reciprocating engines, Caterpillar generators or Onan emergency generators are not in operation at the time the quarterly survey of visible emissions is conducted, the Permittee does not have to set them in operation to conduct the survey. Instead, the Permittee can document that the unit was not operating.

- d. The Permittee shall monitor the lower heating value of the fuel being combusted in the Solar Saturn turbine, Cooper Bessemer reciprocating engines, Caterpillar generators and Onan emergency generators. Compliance with this requirement may be demonstrated by maintaining a copy of that part of the Federal Energy Regulatory Commission (FERC)-approved Tariff agreement that limits transmission of pipeline quality natural gas to having a heating value greater than or equal to 967 Btu/ft<sup>3</sup>.  
[A.A.C. R18-2-306.A.3.c and A.A.C. R18-2-719.I]



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The equipment list in Attachment "C" of Operating Permit No.: 27956 are revised as below to include two (2) emergency generators:

**ATTACHMENT "C": EQUIPMENT LIST**

<b>EQUIPMENT TYPE</b>	<b>MAX. CAPACITY*</b>	<b>MAKE</b>	<b>MODEL</b>	<b>SERIAL NUMBER</b>	<b>INSTALLATION/ MFG DATE</b>	<b>NSPS APPLICABLE</b>
Solar Saturn Natural Gas Turbine Engine	1040 hp	Solar Saturn	T-1001S	401018	Installed June 9, 1964.	No
Cooper Bessemer Reciprocating Engine	4080 hp	Cooper Bessemer	8W330	49094	June 3, 1991	No
Cooper Bessemer Reciprocating Engine	4080 hp	Cooper Bessemer	8W330	49095	June 18, 1991	No
Cooper Bessemer Reciprocating Engine	4080 hp	Cooper Bessemer	8W330	49096	July 19, 1991	No
Caterpillar Generator	1500 hp	Caterpillar	3606 SI	3XF00019	June 12, 1991	No
Caterpillar Generator	1500 hp	Caterpillar	3606 SI	3XF00020	July 31, 1991	No
Communications Building Emergency Generator	135 hp	Onan	LSG-8751-6003-C	12228	N/A	No
Communications Building Emergency Generator	10 hp	Onan	P218G-I/11140C	A913756880	N/A	No

\* Site horsepower @ 75° F Cooper Bessemer and Caterpillar units. Site Elevation is approximately 634 feet. For Cooper Bessemer units, summer time site- rated hp is 4080 bhp with an evaporatively cooled inlet air temperature of 75° F, and the winter site-rated hp is 4640 hp at an evaporatively cooled inlet air temperature of 40° F. The Caterpillar unit rated hp is 1500 at 1118.5 KW and 900 RPM. Site horsepower @ 75° F for Solar unit.

